

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: House to Home Strategies LLC
Debtor(s)

**U.S. Bank National Association as Trustee of Greene
Street Funding Trust**

Movant

vs.

House to Home Strategies LLC
Respondent(s)

BK NO. 22-11690 ELF

Chapter 11

Hearing Date:

**OBJECTION OF U.S. BANK NATIONAL ASSOCIATION AS TRUSTEE OF GREENE
STREET FUNDING TRUST
TO CONFIRMATION OF CHAPTER 13 PLAN**

U.S. Bank National Association as Trustee of Greene Street Funding Trust (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. On October 28, 2022, Secured Creditor filed a secured proof of claim setting forth pre-petition arrears in the amount of \$292,556.12.
2. Debtor's Plan provides for payment in the amount of \$0.00 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$292,556.12, and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor, U.S. Bank National Association as Trustee of Greene Street Funding Trust, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: January 5, 2023

By: /s/ Denise Carlon, Esquire
Denise Carlon, Esquire
KML Law Group, P.C.
The Lits Building
701 Market Street, Suite 5000
Philadelphia, PA 19106
215-627-1322
Attorney for Movant/Applicant

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IN RE: House to Home Strategies LLC
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CHAPTER 13
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CERTIFICATION OF SERVICE

I, the undersigned, hereby certify that the foregoing Objection to Confirmation was served by first class mail, postage pre-paid, upon the parties listed below on **January 5, 2023**.

Hopkins & Schafkopf LLC
11 Bala Avenue
Bala Cynwyd, PA 19004

House to Home Strategies LLC
3460 Ridge Pike
Collegeville, PA 19426

Date: January 5, 2023

By: /s/ Denise Carlon, Esquire
Denise Carlon, Esquire
KML Law Group, P.C.
The Lits Building
701 Market Street, Suite 5000
Philadelphia, PA 19106
215-627-1322
Attorney for Movant/Applicant

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Trustee

ORDER

Upon consideration of the Objection to Confirmation of the Chapter 13 Plan filed by U.S. Bank National Association as Trustee of Greene Street Funding Trust, it is **Ordered** and **Decreed** that confirmation is **denied**.

Bankruptcy Judge